## Case 1:15-ap-01023 Doc 59 Filed 04/10/16 Entered 04/11/16 00:36:02 Desc Imaged Certificate of Notice Page 1 of 3

Bankruptcy Co District of Rhode Island

Fraoli,

Plaintiff Adv. Proc. No. 15-01023-DF

Galleshaw,

Ďefendant

#### CERTIFICATE OF NOTICE

District/off: 0103-1 User: holly2 Page 1 of 1 Date Rcvd: Apr 08, 2016

Form ID: pdfdoc Total Noticed: 2

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on

Apr 10, 2016.

Office of the U.S. Trustee, ust +Gary L. Donahue, U.S. Courthouse, One Exchange Terrace Suite 431, Providence, RI 02903-1744

dft +Gerald R Galleshaw, 60 Jane Street, North Providence, RI 02904-5041

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

TOTAL: 0

\*\*\*\*\* BYPASSED RECIPIENTS (undeliverable, \* duplicate) \*\*\*\*\*

+Gerald R Galleshaw, 60 Jane Street, North Providence, RI 02904-5041 CC\*

TOTALS: 0, \* 1, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Signature: /s/Joseph Speetjens Date: Apr 10, 2016

#### CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on April 8, 2016 at the address(es) listed below:

Kelly A Carden on behalf of Counter-Defendant David C Fraoli kcarden@bilodeaucarden.com

Kelly A Carden on behalf of Plaintiff New England Auto Center, Inc. kcarden@bilodeaucarden.com

on behalf of Plaintiff David C Fraoli kcarden@bilodeaucarden.com Kelly A Carden

Ryanna T. Capalbo on behalf of Plaintiff David C Fraoli rcapalbo@bilodeaucarden.com

Ryanna T. Capalbo on behalf of Defendant Gerald R Galleshaw rcapalbo@bilodeaucarden.com

on behalf of Counter-Defendant David C Fraoli rcapalbo@bilodeaucarden.com Ryanna T. Capalbo

Ryanna T. Capalbo on behalf of Plaintiff New England Auto Center, Inc.

rcapalbo@bilodeaucarden.com

Todd Dion

on behalf of Plaintiff David C Fraoli toddsdion@msn.com on behalf of Counter-Defendant David C Fraoli toddsdion@msn.com Todd Dion

Todd Dion on behalf of Counter-Claimant Gerald R Galleshaw toddsdion@msn.com

on behalf of Defendant Gerald R Galleshaw toddsdion@msn.com Todd Dion

TOTAL: 11

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# UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF RHODE ISLAND

IN RE: Gerald R. Galleshaw

Debtor

:

DAVID C. FRAIOLI and NEW

ENGLAND AUTO CENTER, INC.

Plaintiffs : CASE NO: 15-11047

:

V. :

CHAPTER 7

:

GERALD R. GALLESHAW, : ADV. PRO. NO.: 15-01023

Defendant :

### JOINT MOTION TO EXTEND TIME TO FILE PRE-TRIAL STATEMENT

Now comes Plaintiffs, David C. Fraioli and New England Auto Center, Inc. (collectively "Plaintiff") and Defendant/Debtor, Gerald R. Galleshaw ("Defendant"), by its counsel, hereby moves this honorable Court to allow an extension of time to a joint pre-trial statement in accordance to the Scheduling Order that was entered by this Court on November 5, 2015. As grounds therefore, the parties have not had the opportunity to discuss said joint pre-trial statement and Defendant's counsel has experienced an unexpected family tragedy. Further, the parties state that the within Motion is the first request for an extension of time with respect to filing the joint pre-trial statement.

Wherefore, the parties respectfully request that an extension of time up to one (1) month or a time that is convenient with this Court, be granted to allow the parties to submit a joint pretrial statement.

David C. Fraioli and New England Auto Center, Inc. By its Attorneys, Gerald R. Galleshaw, By his Attorney,

/s/ Ryanna T. Capalbo, Esq

Andrew R. Bilodeau, Esq. Ryanna T. Capalbo, Esq. Bilodeau Carden Capalbo, LLC 51 Jefferson Blvd, Suite 2 Warwick, RI 02888

Tel: 401.461.7700 Fax: 401.633.7511

Dated: April 8, 2016

/s/ Todd Dion, Esq.

Todd Dion, Esq. Law Office of Todd S. Dion 1599 Smith Street North Providence, RI 02911 Tel: (401) 270-0639